

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO

JOHN NOAKES

PLAINTIFF,

v.

THE UNIVERSITY OF CINCINNATI, ET  
AL

DEFENDANTS.

Case No. 1:23-cv-00284-MRB

Judge BARRETT

UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO  
RESPOND TO MOTION TO  
DISMISS

Pursuant to Local Rule 7.3, and with the assent of all parties, Plaintiff respectfully submits this Motion for a seven day extension of time to file a response to Defendant's Renewed Motion to Dismiss (Doc#61). As grounds for this Motion, Plaintiff states

1. Plaintiff's Response is currently due on July 7, 2025. Counsel requires additional time in order to adequately respond to the Motion.

2. This extension is not requested for the purposes of delay.

3. Counsel for Defendants have indicated that Defendants do not oppose this Motion.

**Wherefore,** Plaintiff should be allowed until July 14, 2025 to respond to the Renewed Motion to Dismiss.

Respectfully submitted,

\_\_\_\_\_/s/ Joshua A. Engel  
Joshua Adam Engel (0075769)  
Scott O'Reilly (0075717)  
Anne Tamashasky (OH 0064393)  
ENGEL AND MARTIN, LLC  
4660 Duke Dr., Suite 101  
Mason, OH 45040  
(513) 445-9600  
engel@engelandmartin.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been electronically served via the Court's electronic filing system this July 2, 2025 upon all counsel of record.

/s/ Joshua Engel

Joshua Engel